

**DANIEL SZALKIEWICZ & ASSOCIATES, P.C.**

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S.S.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

S.S.,

Plaintiff,

v.

Dezarae Collins,

Defendant.

Case No. 2:23-cv-892

**Certification of Declaration of Daniel S.  
Szalkiewicz, Esq. in Support of Request  
for Entry of Default**

**DANIEL S. SZALKIEWICZ**, of full age, hereby certifies and states:

1. I am a partner at the law firm of Daniel Szalkiewicz & Associates, P.C., attorneys for the Plaintiff in the above-captioned action. As such, I have personal knowledge of the facts contained herein.

2. I make this Certification in support of Plaintiff's application for the entry of default against defendant Dezarae Collins ("Defendant"), pursuant to Federal Rule of Civil Procedure 55(a).

3. Plaintiff's Complaint in this matter was filed on February 16, 2023 (DE 1). The Summons was issued on February 17, 2023 (DE 4).

4. On February 16, 2023, Plaintiff filed a Motion for a Protective Order requesting permission to proceed using his initials (DE 2); on June 22, 2023, that Motion was granted in part (DE 6).

5. On July 24, 2023, following unsuccessful attempts at service, Plaintiff sought permission to serve Defendant through alternative means (DE 9) however Plaintiff's motion was denied (DE 12).

6. Finally, Plaintiff accomplished service on Defendant on November 15, 2023 (DE 13).

7. I have not heard from Defendant nor any counsel for Defendant concerning the filing of an answer to the Complaint and, to my knowledge, no filing with the Court was made by Defendant under Local Civ. R. 6.1(b).

8. The time in which Defendant may answer or otherwise respond to Plaintiff's Complaint has expired and has not been further extended by the Court, and Defendant has not answered or otherwise moved.

9. Upon Plaintiff's information and belief, the Defendant is neither an infant nor an incompetent person requiring special service in accordance with Rule 4(g), Federal Rules of Civil Procedure, and is not serving with the armed forces of the United States entitled to the protection of 50 U.S.C. App. Section 521.

10. This belief is based upon information available at <https://scra.dmdc.osd.mil>, the Official Department of Defense Servicemembers Relief Act ("SCRA") website. I have personally reviewed the Defendant's report generated by the site, attached hereto as Exhibit 1.

11. Accordingly, this request is being made for the entry of default against Defendant in the above-captioned matter.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on: December 12, 2023  
New York, NY

/s/Daniel Szalkiewicz, Esq.  
Daniel S. Szalkiewicz